

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. 07-CV-5944-JST

MDL No. 1917

This Document Relates to:

**STIPULATION AND [PROPOSED] ORDER
RE: CASE SCHEDULE**

**ALL DIRECT PURCHASER ACTIONS
ALL INDIRECT PURCHASER ACTIONS**

Judge: Honorable Jon S. Tigar

1 Direct Purchaser Plaintiffs (“DPPs”), Indirect Purchaser Plaintiffs (“IPPs”) and Defendants
2 Irico Group Corporation and Irico Display Devices Co., Ltd. (“Irico” or the “Irico Defendants,”
3 collectively the “Parties”), by and through the undersigned counsel and pursuant to Federal Rule of
4 Civil Procedure 16(b)(4) and Civil Local Rule 7-12, hereby stipulate as follows:

5 WHEREAS, the Court’s Scheduling Order and Referral to Magistrate Judge for Settlement
6 [ECF 5925] established the schedules for the DPP and IPP cases (“Scheduling Order”);

7 WHEREAS, the Parties previously agreed to modify the existing schedule given the
8 complications arising from the COVID-19 pandemic and to accommodate the good faith efforts of
9 the parties, including the deadline to complete the depositions of Irico employees Su Xiaohua,
10 Wang Zhaojie, and Yan Yunlong, and the Court approved two such stipulations [ECF Nos. 5980;
11 5999];

12 WHEREAS, due to ongoing complications from the COVID-19 pandemic and related
13 controls in China, Irico requires additional time to obtain visas to Macau, where the deposition will
14 need to occur via videoconference, and arrange for its employees’ travel to Macau for depositions;

15 WHEREAS, the parties were unable to schedule the deposition of IPPs’ economic expert
16 witness, Dr. Janet Netz, until June 9, 2022, which is after the close of expert discovery;

17 WHEREAS, the Parties agree that modifying the current discovery schedule would
18 accommodate the Parties’ efforts to complete fact and expert discovery;

19 WHEREAS, the Parties agree that a short adjustment to the schedule for *Daubert* and
20 dispositive motions, motions in limine, other pretrial procedures, and trial is warranted to allow for
21 full consideration of the fact and expert discovery record, and would ensure the most efficient use
22 of the Court’s time and resources; and

23 WHEREAS, the Parties agree that good cause exists to modify existing deadlines and the
24 Scheduling Order as follows, subject to Court approval:

Event	Current Deadline	Proposed Deadline
Last day to complete Expert Deposition of Dr. Janet Netz	May 23, 2022	June 9, 2022
Last day to complete Depositions of Wang Zhaojie, Su Xiaohua, and Yan Yunlong	May 31, 2022	June 30, 2022
<i>Daubert</i> and dispositive motions due	June 27, 2022	July 25, 2022
<i>Daubert</i> and dispositive motion oppositions due	July 25, 2022	August 24, 2022
Close of Fact Discovery	August 1, 2022	September 1, 2022
<i>Daubert</i> and dispositive motion replies due	August 8, 2022	September 7, 2022
Hearings on <i>Daubert</i> and dispositive motions	September 12, 2022 at 2:00 p.m.	October 5, 2022 October 13, 2022
Motions in limine due	November 10, 2022	November 30, 2022
Oppositions to motions in limine due	November 30, 2022	December 21, 2022
Hearings on motions in limine	December 15, 2022 at 9:30 a.m.	January 5, 2023 at 9:30 a.m. February 3, 2023, at 1:30 p.m.
Pretrial conference statement due	January 6, 2023	January 20, 2023 February 17, 2023
Pretrial conference	January 13, 2023 at 2:00 p.m.	January 27, 2023 February 24, 2023, at 2:00 p.m.
Trial	January 30, 2023 at 8:00 a.m.	February 13, 2023 March 13, 2023, at 8:00 a.m.

IT IS HEREBY STIPULATED AND AGREED by and between counsel for DPPs, IPPs and the Irico Defendants that good cause exists to modify the DPP and IPP schedules as follows:

1. The deposition of IPPs' expert, Dr. Janet Netz, shall be completed no later than June 9, 2022.
2. The depositions of Su Xiaohua, Wang Zhaojie, and Yan Yunlong shall be completed by no later than June 30, 2022;
3. Plaintiffs shall propound any additional discovery and take any additional depositions with sufficient time to close Fact Discovery on September 1, 2022;
4. *Daubert* and dispositive motions in the IPP action shall be due by July 25, 2022, with oppositions due by August 24, 2022 and replies due by September 7, 2022;

1 5. Hearings on *Daubert* and dispositive motions in the IPP action shall take place on
2 ~~October 5, 2022 or on a subsequent date at the Court's convenience~~; October 13, 2022;

3 6. Motions in limine in the IPP action shall be due by November 30, 2022, with
4 oppositions due by December 21, 2022.

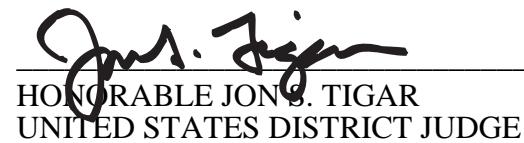
5 7. Hearings on motions in limine in the IPP action shall take place on ~~January 5, 2023~~
6 ~~or on a subsequent date at the Court's convenience~~; February 3, 2023, at 1:30 p.m.;

7 8. The pretrial conference for the IPP action shall take place on February 24
8 ~~January 27, 2023~~, with pretrial conference statements due by February 17 ~~January 20~~, 2023.

9 9. Trial for the IPP action shall commence on ~~February~~ March 13, 2023, at 8:00 am.

10 **PURSUANT TO STIPULATION AND GOOD CAUSE APPEARING, IT IS SO
11 ORDERED AS MODIFIED.**

12 Dated: May 25, 2022


13 HONORABLE JON S. TIGAR
14 UNITED STATES DISTRICT JUDGE

1 Dated: May 25, 2022

2
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47 *Plaintiffs*

ATTESTATION

I, Lauren C. Capurro, hereby attest, pursuant to United States District Court, Northern District of California Civil Local Rule 5-1(i)(3), that each of the other Signatories have concurred in the filing of the document.

By: /s/ Lauren C. Capurro

Mario N. Alioto